

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

April 8, 2014

VIA E-MAIL AND REGULAR MAIL

COPY

Rathon Corporation
c/o Mr. Michael J. Glade, P.E.
Vice President
1225 17th Street, Suite 3200
Denver, Colorado 80202

✓ The Hillshire Brands Company
c/o Mr. Kent B. Magill, Esq.
Executive Vice President
400 South Jefferson Street
Chicago, Illinois 60607

Re: Voluntary Remediation Program Semi-Annual Status Report, January 10, 2014
Former Oxford Chemical Property, Sublisted to HSI Site No. 10072
5001 Peachtree Blvd, Chamblee, DeKalb County, Georgia
Tax Parcel 18-278-14-002

Dear Messrs. Glade and Magill:

The Georgia Environmental Protection Division (EPD) has reviewed the January 10, 2014 Voluntary Remediation Program (VRP) Semi-Annual Status Report for the former Oxford Chemical Site dated January 10, 2014. EPD's comments are provided below and should be addressed in accordance with the Voluntary Remediation Program Act (the Act):

1. EPD agrees that comments delivered via email correspondence dated September 26, 2013, concerning revised Risk Reduction Standards (RRS) have been adequately addressed. Therefore, the RRS presented in Tables 1 and 2 of Appendix A are considered finalized.
2. Except as noted in this letter, EPD concurs with the email summary dated March 27, 2014 of the meeting between EPD and Len Diprima of Woodard & Curran on February 19, 2014, which was held to discuss the above referenced report and plans for upcoming soil remediation activities.
3. EPD agrees that delineation of soil contamination to Type 1 RRS is complete for the site, with the exception of west of WCB-84.
4. EPD agrees that sufficient characterization of soils in the former locations of the wastewater treatment plant and holding pond, the empty drum storage area, Building "C"/Powder Plant, and the loading/unloading areas of the rail spur lines has now been completed. In addition to the supplemental sampling proposed in Section 3.2 and in the meeting summary to supplement/characterize soils that exceed Type 3/4 RRS, EPD recommends sampling the unexcavated area immediately south of B-19-03 and the area east of WCB-48 and north of B-17.
5. Some of the soil borings shown on figures depicting soil sample locations sampled in 2013 (symbolized with a red dot) are not shown in Table 1, which presents September 2013 soil sampling results. Specifically, the following borings shown on Figures 1, 2, and 4 are not shown in Table 1: WCB-1 through WCB-27, WTF-VER74A, B-1, B-2, B-5-02, B-8, B-9,

B-10, B-19, B-22-03, and B-23-03. (Note: WTF-VER-74A is a May 2008 sample. Samples designated B-x appear also to be from an earlier sampling event.) For samples collected in 2013, but before the September sampling event, please provide a table presenting sampling results and date in the next semi-annual progress report. For samples collected prior to 2013, please update the symbol used on Figures 1, 2, and 4 to reflect the correct year of sampling.

6. The meeting summary is correct that separate VRP applications are not necessary for impacted properties where groundwater corrective action is not required under the exemption of Section 12-8-107(g)(2) of the Act. However, if potential exposure pathways such as vapor intrusion are identified and controls are proposed to mitigate those pathways, a VRP application must be submitted for those impacted properties.
7. The report did not include the laboratory analytical report for soil and groundwater sampling. Please provide, in PDF format on a CD (no paper copy), the laboratory analytical report, including chain of custody records, for all samples collected during this reporting period.
8. The groundwater sampling log was not included in the report for monitoring well EW-A2. The log for EW-A1 was duplicated in the report, which may have led to the omission of EW-A2. Please include the September 2013 sampling log for EW-A2 in the next semi-annual progress report.
9. During the September 2013 groundwater sampling event, the pH had not stabilized (varies not more than +/- 0.1 units over three consecutive measurements) when the sample was collected from wells BH-19 and MW-A. Continue to purge until stability is achieved (see Groundwater Sampling, USEPA SESDPROC-301-R3, Section 3.2).
10. Turbidity was not reported on the sampling form for any of the samples collected during any of the 2013 groundwater sampling events. Even though samples are not being analyzed for metals, turbidity is still important because of the tendency of some pesticides to adsorb strongly to soil components. Therefore, monitor and use turbidity in determining purge adequacy (turbidity not greater than 10 NTUs, see SESDPROC-301-R3, Section 3.2)
11. For the low-flow purging method, the pump intake should be placed near the mid-point of the screened interval. The well sampling form provided in the report contains no information on the screened interval of the well or the pump intake depth. For future sampling events, state the screened interval and the pump intake depth.
12. Polyethylene tubing may be used for routine monitoring events; however, Teflon tubing must be used when sampling to show compliance with Risk Reduction Standards. For future sampling events, please state whether polyethylene or Teflon tubing was used.

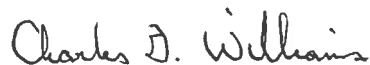
Rathon Corporation and Hillshire Brands Company must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents

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submitted by Rathon Corporation and Hillshire Brands Company. However, failure of EPD to respond to a submittal within any timeframe does not relieve Rathon Corporation and Hillshire Brands Company from complying with the provisions, purposes, standards and policies of the Act.

Please address the above comments in subsequent semi-annual reports. The next semi-annual progress report is due July 2, 2014. If you have any questions, please contact Terry Allison at (404) 463-7513.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Leonard J. Diprima, P.G., Woodard & Curran, Inc.

File: 218-0244

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